

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHUBB SEGUROS PERU S.A. a/s/o Ingram
Micro SAC and Saint Gobain Peru, S.A.,
INGRAM MICRO SAC, SAINT GOBAIN
PERU, S.A., and INTCOMEX PERU SAC,

Plaintiffs,

- against -

M/V AS FORTUNA, her engines, boilers, etc.,
AS FORTUNA OPCO B.V., JAS
FORWARDING SERVICES (IRELAND)
LIMITED d/b/a/ Blue World Line, SHIPCO
TRANSPORT INC., and ONBOARD
LOGISTICS USA INC.,

Defendants.

20-cv-3392 (ALC)(DF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that pursuant to leave granted by this Court's order of February 18, 2021 (D.E. 52) and this Court's further Order of February 19, 2021 setting a briefing schedule (D.E. 54), Defendant Shipco Transport Inc. ("Shipco") by its attorneys Maloof & Browne LLC, will move before the Honorable Andrew L. Carter, Jr., U.S.D.J., at a time, date and location to be set by the Court, for an Order granting Judgment on the Pleadings in favor of Shipco pursuant to Fed. R. Civ. P. Rule 12(c) and 19, and/or an Order granting Summary Judgment in favor of Shipco pursuant to Fed. R. Civ. P. 56, dismissing Shipco from this litigation with prejudice, and/or for such other and further relief as the Court may deem just and proper.

This motion will be supported by 1) the accompanying Memorandum of Law, 2) the Declaration of Kipp C. Leland, Esq. with accompanying exhibits, 3) the Declaration of Kevin Danes with accompanying exhibits, 4) the Declaration of Joseph Tan with accompanying exhibits, and 5) the Declaration of Ingrid Velez with accompanying exhibits.

Dated: Rye, New York
February 25, 2021

MALOOF & BROWNE LLC

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